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**From:** Roth, Mary Jo GRE-MG [mjroth@GREnergy.com]  
**Sent:** 12/3/2018 5:53:01 PM  
**To:** Johnson, Barnes [Johnson.Barnes@epa.gov]; Huggins, Richard [Huggins.Richard@epa.gov]  
**CC:** Wright, Peter [wright.peter@epa.gov]; Cook, Steven [cook.steven@epa.gov]; Devlin, Betsy [Devlin.Betsy@epa.gov]; Stockdill, Shane GRE-CC [SStockdill@GREnergy.com]; Green, Douglas H. [DHGreen@Venable.com]; Roewer, James [JRoewer@eei.org]; hdregister@cmsenergy.com; Charles, Jennifer GRE-CC [jcharles@GREnergy.com]; Heinen, Erik GRE-MG [EHeinen@GREnergy.com]  
**Subject:** Great River Energy's Alternative Liner System Demonstration  
**Attachments:** 12-03-2018\_CCR liner equivalency demonstration.pdf; 1893823\_AltLinerDemo\_Fnl\_30Nov18.pdf

Messrs. Johnson and Huggins:

Attached please find a transmittal letter and an alternative liner system demonstration report prepared by Golder Associates Inc. regarding two unlined CCR surface impoundments at our Coal Creek Station. We are providing this information to EPA as record evidence to support the development of a new liner equivalency demonstration in the CCR rule.

I appreciate your consideration of this alternative demonstration of actual performance which equals or *exceeds* the performance of the liner criteria in the CCR rule in protecting human health and the environment.

MJ

**Mary Jo Roth**  
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